



07-CV-05698-ORD

The Honorable Ronald B. Leighton

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CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA

Plaintiff,

v.

GLEN A. MOREHOUSE, EMMA J.
MOREHOUSE, RUSSELL BOLEN, CLARK
COUNTY, CEDAR CREEK PROPERTY
OWNERS ASSOCIATION, FIRST
INDEPENDENT BANK, TRANSAMERICA
INDUSTRIAL LOAN,

Defendants.

Civil No. 07-5698RBL

STIPULATION BETWEEN THE
UNITED STATES AND FIRST
INDEPENDENT BANK

STIPULATION BETWEEN
UNITED STATES AND FIRST INDEPENDENT
BANK
(Civ. No. 07-5698RBL)

United States Department of Justice
P.O. Box 683, Ben Franklin Station
Washington, D.C. 20044-0683
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2 IT IS HEREBY STIPULATED AND AGREED by the United States of America ("United
3 States") and First Independent Bank ("First Independent") that:

- 4 1. The United States filed this action to foreclose federal tax liens on a parcel of real property
5 located in Clark County, Washington referred to as the "Amboy Residence" in the United States'
6 Complaint.^{1/}
- 7 2. The United States filed notices of federal tax lien in the Clark County Recorder's Office pursuant
8 to 26 U.S.C. § 6323(a) to make its liens against any and all real property owned by Glen A.
9 Morehouse, including the Amboy Residence, effective against persons entitled to such notice.
- 10 3. The United States and First Independent entered into a stipulation on October 10, 2008, which
11 provided that First Independent's deed of trust dated March 24, 1978 encumbering the Amboy
12 Residence was properly recorded and had priority over the United States' interest in the Amboy
13 Residence secured by federal tax liens. First Independent agreed to not oppose the United States'
14 request for an Order of the Court foreclosing the tax liens upon Glen Morehouse's interest in the
15 Amboy Residence. See Stipulation between the United States and First Independent at docket
16 #10, ¶ 5-6.
- 17 4. Following entry of the stipulation between the United States and First Independent Bank, the debt
18 secured by First Independent's deed of trust dated March 24, 1978 was fully paid.
- 19 5. First Independent disclaims all interest in the Amboy Residence.
- 20 6. Having no claim or interest in the Amboy Residence, First Independent should be dismissed from
21 this action with prejudice.

22
23 ^{1/} The Amboy Residence is legally described as follows:

24 The East half of the Southwest quarter of the Northeast quarter of Section 20, Township 5 North,
25 Range 3 East of the Willamette Meridian, Clark County, Washington. EXCEPT that portion lying
26 within NE 389th Street.

27 STIPULATION BETWEEN
28 UNITED STATES AND FIRST INDEPENDENT
BANK
(Civ. No. 07-5698RBL)

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2 DATED this 14th day of April, 2009.

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JEFFREY C. SULLIVAN
United States Attorney

DATED this 15 day of April, 2009.

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Attorneys for United States

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14 IT IS SO ORDERED THIS 16th DAY OF April, 2009

15 Rebecca L. ...
16 UNITED STATES DISTRICT COURT JUDGE
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27 STIPULATION BETWEEN
28 UNITED STATES AND FIRST INDEPENDENT
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(Civ. No. 07-5698RBL)

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